

FILED

SEP 17 2019

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

JASPER E. SHOOK,
CHRISTINE SHOOK,

Defendants.

Criminal No.

2:19CR28

Violations:

18 U.S.C. § 371
18 U.S.C. § 2251(a)
18 U.S.C. § 2251(b)
18 U.S.C. § 2251(e)
18 U.S.C. § 2252A(a)(2)(B)
18 U.S.C. § 2252A(a)(5)(B)
18 U.S.C. § 2252A(b)(1)
18 U.S.C. § 2252A(b)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Commit Production Child Pornography)

On or between a date in 2015 and May 9, 2019, in Grant County, in the Northern District of West Virginia and elsewhere, defendants, **JASPER E. SHOOK** and **CHRISTINE SHOOK**, did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding together with each other, to violate Title 18, United States Code Section 2251(a), to employ and use a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct.

In furtherance of the conspiracy and to effect the object of the conspiracy, the following overt acts, among others, were committed within the Northern District of West Virginia, and elsewhere:

Overt Acts

1. On a date not known to the grand jury but during the period 2015 to May 9, 2019, defendants, JASPER SHOOK and CHRISTINE SHOOK, produced an image of child pornography.
2. On or about May 7 and May 8, 2019, defendant, JASPER E. SHOOK, communicated with an individual known to the grand jury that he and his wife CHRISTINE SHOOK, "love the young scene. Is it safe to send pics on here?"
3. That on or about May 7 and May 8, 2019, defendant, JASPER E. SHOOK, distributed an image of a prepubescent female engaged in sexually explicit conduct to the individual known to the grand jury.
4. That on or about May 9, 2019, defendants, JASPER E. SHOOK and CHRISTINE SHOOK, possessed images of child pornography, which they had produced, including an image of a prepubescent female who had not yet attained the age of 12 years of age.
5. And other overt acts.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(Distribution of Child Pornography)

On or between May 7, 2019 and May 8, 2019, at or near Grant County, within the Northern District of West Virginia, the defendant, **JASPER E. SHOOK**, did knowingly distribute child pornography, that involves a visual depiction of sexually explicit conduct, where the production of such visual depiction involves the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(B) and Title 18, United States Code, Section 2252A(b)(1).

COUNT THREE

(Aiding and Abetting Possession of Child Pornography)

On or about May 9, 2019, at or near Grant County, within the Northern District of West Virginia, and elsewhere, the defendants **JASPER E. SHOOK** and **CHRISTINE SHOOK**, aided and abetted by each other, did knowingly possess an image of child pornography, as defined in Title 18, United States Code Section 2256(8), which had been transported in interstate and foreign commerce by computer, and that involved a pre-pubescent minor who had not attained 12 years of age; in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and Title 18, United States Code, Section 2252A(b)(2).

COUNT FOUR

(Aiding and Abetting Production of Child Pornography)

Between 2015 and on or about May 9, 2019, the exact date being unknown to the Grand Jury, in Grant County, within the Northern District of West Virginia, the defendants, **JASPER E. SHOOK** and **CHRISTINE SHOOK**, being the parents, legal guardians, or persons having custody of control of a minor, aided and abetted by one another, knowingly permitted the minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct and such parent, legal guardian, and person knew or had reason to know that such visual depiction would be transported and transmitted using any means of facility of interstate or foreign commerce, and such visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2251(b) and Title 18, United States Code, Section 2251(e).

FORFEITURE ALLEGATION

(Sexual Exploitation of Children)

Pursuant to Title 18, United States Code, Section 2253, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter, any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, and any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from a violation of Title 18, United States Code, Section 2252A, including the following items all seized from the defendants:

Electronic Equipment

01. Samsung Smartphone
02. Silver Fujifilm Camera with SD Card
03. Pink Sanyo Camera with SD Card
04. SD Card
05. Disk Labeled Pictures
06. Silver HP Laptop with Thumb Drive
07. Sony Handicam with SD Card
08. Olympus Camera
09. Western Digital Hard Drive
10. Black HP laptop
11. Western Digital Hard Drive
12. Seagate Hard Drive
13. Logi Camera Connected to Selfie Stick
14. Apple iPad
15. Smarttab Notebook
16. Nextbook Tablet
17. Kyocera Smartphone
18. LG Smartphone
19. A&S Smartphone
20. Alcatel Cellphone
21. LG Trace Phone

- 22. Samsung Cellphone
- 23. Black Moto Cellphone

Miscellaneous Items

- 1. Infant Dolls with Sexually Explicit Markings
- 2. Two Pairs of Sexually Altered Underwear Size 2T/3T
- 3. T-shirt with Sexually Explicit Logo
- 4. Two Sex Toys
- 5. Plastic Container of Vaseline
- 6. Home Made Whip
- 7. Home Made Paddles with Sexually Explicit Writing, Screws, and Needles

A True Bill,

/s/
Grand Jury Foreperson
(Signature on File)

/s/
WILLIAM J. POWELL
United States Attorney

Kimberley D. Crockett
Assistant United States Attorney